

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Norfolk Division

UNITED STATES OF AMERICA

v.

COREY WRIGHT,

Defendant.

Criminal No. 2:23-CR-127-1

MOTION TO SEAL

The United States of America, through its attorneys, Jessica D. Aber, United States Attorney, Luke J. Bresnahan and John F. Butler, Assistant United States Attorneys, pursuant to Local Criminal Rule 49(B), moves to seal Government's Exhibit 1 to the Position of the United States with Respect to Sentencing, ECF No. 316.

Sealing is necessary to avoid disclosure of sensitive information in this case. Specifically, Government's Exhibit 1 is the presentence report relating to Defendant Wright's prior federal conviction in federal court in the Eastern District of Virginia. The presentence report contains sensitive information regarding Defendant Wright.

Such sealing is within the discretion of this Court and may be granted "for any legitimate prosecutorial need." *United States v. Ramey*, 791 F.2d 317, 321 (4th Cir. 1986); *see also Baltimore Sun Co. v. Goetz*, 886 F.2d 60, 65 (4th Cir. 1989).

The United States requests that Government's Exhibit 1 to the Position of the United States with Respect to Sentencing be filed under seal pending further order of this honorable Court.

Respectfully submitted,

Jessica D. Aber
United States Attorney

By: _____/s/

Luke J. Bresnahan
John F. Butler
Assistant United States Attorneys
United States Attorney's Office
101 West Main Street, Suite 8000
Norfolk, Virginia 23510
Office Number: 757-441-6331
Facsimile Number: 757-441-6689
Email Address: luke.bresnahan@usdoj.gov
john.f.butler@usdoj.gov

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of October, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification to all counsel of record.

_____/s/_____

Luke J. Bresnahan
Assistant United States Attorney
United States Attorney's Office
101 West Main Street, Suite 8000
Norfolk, Virginia 23510
Office Number: 757-441-6331
Facsimile Number: 757-441-6689
Email Address: luke.bresnahan@usdoj.gov